

STAMPUR & ROTH
ATTORNEYS AT LAW

WILLIAM J. STAMPUR
JAMES ROTH

299 BROADWAY, SUITE 800
NEW YORK, N.Y. 10007

(212) 619-4240
FAX (212) 619-6743

April 17, 2020

By Email

The Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Adam Bonano, et al.*
13 Cr. 957 (LTS)

Dear Judge Swain:

I respectfully request an adjournment of Mr. Bonano's sentence, now scheduled for April 29, 2020, until either May 15, 18, or 22. It is my understanding that under the new protocol sentencing should be set for either Mondays Wednesdays or Fridays in the morning. The request is made so I may have additional time to speak with Mr. Bonano and finalize a sentence submission on his behalf.

AUSA Thomas Wright has no objection to said request.

The adjournment request is granted. The Court will request a videoconference setting, with 15 minutes beforehand for Defendant's consultation with counsel, for the morning of Monday May 18, 2020. No conference date and time can be confirmed before the end of the preceding week, so counsel are requested to keep their calendars open for the hours of 9AM to 2PM on May 18, 2020, until further notice. Defense counsel is requested to review the enclosed waiver form with Defendant prior to the conference so that Defendant can verify his consent at the beginning of the conference. DE#161 resolved.

Very truly yours,

William J. Stampur
William J. Stampur

SO ORDERED.

4/24/2020

/s/ Laura Taylor Swain, USDJ

cc: AUSA Thomas Wright

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA

-v-

ADAM BONANO,
Defendant.

**WAIVER OF RIGHT TO BE PRESENT
AT CRIMINAL PROCEEDING**

13-CR-957 (LTS)

-----X

Check Proceeding that Applies

Entry of Admission of Specification(s) of Violation

I am aware that I have been charged with violations of conditions of my supervised release. I have read the Probation Department's Amended Violation Report, dated March 18, 2020, containing the supervised release violation charges against me and have consulted with my attorney about those charges. I have decided that I wish admit to certain charged violations. I understand I have a right to appear before a judge in a courtroom in the Southern District of New York to enter my admission(s) and to have my attorney beside me as I do. I am also aware that the public health emergency created by the COVID-19 pandemic has interfered with travel and restricted access to the federal courthouse. I have discussed these issues with my attorney. By signing this document, I wish to advise the court that I willingly give up my right to appear in person before the judge to enter my admission(s). By signing this document, I also wish to advise the court that I willingly give up any right I might have to have my attorney next to me as I enter my admission(s) so long as the following conditions are met. I want my attorney to be able to participate in the proceeding and to be able to speak on my behalf during the proceeding. I also want the ability to speak privately with my attorney at any time during the proceeding if I wish to do so.

Date:

Print Name

Signature of Defendant

Sentence

I understand that I have a right to appear before a judge in a courtroom in the Southern District of New York at the time of my sentence and to speak directly in that courtroom to the judge who will sentence me. I am also aware that the public health emergency created by the COVID-19 pandemic has interfered with travel and restricted access to the federal courthouse. I do not wish to wait until the end of this emergency to be sentenced. I have discussed these issues with my attorney and willingly give up my right to be present, at the time my sentence is imposed, in the courtroom with my attorney and the judge who will impose that sentence. By signing this document, I wish to advise the court that I willingly give up my right to appear in a courtroom in the Southern District of New York for my sentencing proceeding as well as my right to have my attorney next to me at the time of sentencing on the following conditions. I want my attorney to be able to participate in the proceeding and to be able to speak on my behalf at the proceeding. I also want the ability to speak privately with my attorney at any time during the proceeding if I wish to do so.

Date: _____

Print Name

Signature of Defendant

I hereby affirm that I am aware of my obligation to discuss with my client the charges against my client, my client's rights to attend and participate in the criminal proceedings encompassed by this waiver, and this waiver and consent form. I affirm that my client knowingly and voluntarily consents to the proceedings being held with my client and me both participating remotely.

Date: _____

Print Name

Signature of Defense Counsel

Addendum for a defendant who requires services of an interpreter:

I used the services of an interpreter to discuss these issues with the defendant. The interpreter also translated this document, in its entirety, to the defendant before the defendant signed it. The interpreter's name is: _____.

Date: _____

Signature of Defense Counsel

Accepted: _____

Signature of Judge

Date: